

EXHIBIT 2

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE:
IN SUPPORT OF REPLY COMMENTS
BY EL DORADO COMMUNICATIONS, INC.
MM DOCKET 99-26

JUNE 23, 1999

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ENGINEERING STATEMENT IN SUPPORT OF
REPLY COMMENTS - MM DOCKET 99-26
COUNTERPROPOSALS TO AMEND THE FM TABLE OF ALLOTMENTS
ALLOTMENT OF 285A TO REEVES, LOUISIANA
OR
MOVING 285A, ROSENBERG TO 285C3, MISSOURI CITY, TEXAS
MOVING 285A, GALVESTON TO 287A, CRYSTAL BEACH, TEXAS
MOVING 287C2, LAKE CHARLES TO 285C3, MOSS BLUFF, LOUISIANA

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MULLANEY ENGINEERING, INC.

DECLARATION

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained by El Dorado Communications, Inc. to prepare reply comments concerning the counterproposals filed in MM Docket 99-26.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.


John J. Mullaney

Executed on the 23rd day of June 1999.

MULLANEY ENGINEERING, INC.

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**IN SUPPORT OF REPLY COMMENTS
BY EL DORADO COMMUNICATIONS, INC.
MM DOCKET 99-26**

NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement has been prepared on behalf of El Dorado Communications, Inc. ("El Dorado"). The purpose of this statement is to support reply comments by El Dorado concerning two counterproposals filed in MM Docket 99-26.

MM Docket 99-26 initially involved the proposed allotment of FM Channel 285A to Pitkin, Louisiana. Two separate counterproposals were timely filed in that docket and the original petitioner, Panther Broadcasting of Louisiana, failed to file supporting comments. Thus, Pitkin, LA, is no longer in consideration for an allotment.

Counterproposal-1 was filed by Arkansas Wireless Co. ("Wireless") requesting the allotment of FM Channel 285A to Reeves, LA.

Counterproposal-2 was filed by Tichenor License Corporation requesting the deletion and re-allotment of three FM Channels at three separate communities and the continued operation by the respective licensees.

Deletion of 285A at Rosenberg, TX, and the re-allotment of 285C3 to Missouri City, TX. Tichenor is the licensee of KOVA 285A at Rosenberg.

Deletion of 285A at Galveston, TX, and the re-allotment of 287A to Crystal Beach, TX. Tichenor is the licensee of KLTO 285A at Galveston.

Deletion of 287C2 at Lake Charles, LA and the re-allotment of 285C3 to Moss Bluff, LA. Tichenor has a reimbursement agreement with the licensee of KZWA 287C2 at Lake Charles.

El Dorado believes that an entire new NPRM should be issued in this case because the captioned city failed to receive an indication of continuing interest. In the alternative, El Dorado supports the allotment of an FM Channel to Reeves, LA, and opposes the three substitutions proposed by Tichenor.

II. ENGINEERING DISCUSSION:

A. Reeves, LA - Proposal:

El Dorado supports the proposal by Arkansas Wireless to allot a new FM channel (285A) to Reeves, LA. An independent population evaluation of the allotment reference point indicates the potential maximum facility 60 dBu contour will provide service to 25,580 persons.

B. Tichenor Proposal:

El Dorado opposes the proposal by Tichenor which involves the re-location and disruption of three existing stations. The first change is a co-channel upgrade with a new city of license, the second is a channel change with a new city of license and the third is a channel change & downgrade with a new city of license.

We have reviewed the engineering statement prepared by du Treil, Lundin & Rackley, Inc., in support of the Tichenor proposal and find it to be factually accurate. Page 4 of that statement contained an analysis of the gain and loss populations resulting from each of the three proposals.

At the present time, the KOVA FM facility at Rosenberg has a 60 dBu population of 610,359 persons. The upgrade and move to Missouri City will result in a 60 dBu population of 2,424,036 persons. Of the existing service 44,784 persons will lose an FM service and 1,858,461 persons will gain an additional service. Tichenor also states that all of this gain & loss area is served by more than 5 existing aural services (page 5 of engineering). Figure 9 of the Tichenor engineering indicates that some of the Houston area population currently receive service from 26 existing aural services. The community of Missouri City has a population according to the 1990 Census of 36,176 persons and is part of the Houston Urbanized Area. The community of Rosenberg has a population of 20,183 persons.

At the present time, the Galveston facility has a 60 dBu population of 107,331 persons. The channel change and move to Crystal Beach will result in a 60 dBu population of 3,874 persons. Since the Galveston facility is currently a Class A station no downgrade was possible. Of the existing service 105,225 persons will lose an FM service and 1,768 persons will gain an additional service. Tichenor also states that all of this gain & loss area is served by more than 5 existing aural services.

At the present time, the Lake Charles facility has a 60 dBu population of 340,412 persons. The channel change, downgrade and move to Moss Bluff will result in a 60 dBu population of 177,079 persons. Of the existing service 180,640 persons will lose an FM service and 17,307 persons will gain an additional service. Tichenor also states that most of this gain & loss area is served by more than 5 existing aural services. However, 1,495 persons losing service will now be limited to just 3 existing aural services and 444 persons will now be limited to just 4 existing aural services.

C. Public Service Comparison:

By re-allocating Ch. 285C3 to Missouri City the Tichenor proposal improves the service population of the Rosenberg station at the cost of a substantial reduction in the service populations of both the Galveston & Lake Charles stations.

The upgraded operation at Missouri City will result in a 297 percent increase in total population with a 7.3 percent loss in population. All of the gain and loss population receives more than 5 aural services.

The operation at Crystal Beach will result in a 96.4 percent reduction in total population with 98.0 percent of the population being currently served losing that service. If Tichenor did not already control the Galveston facility it would appear extremely unlikely that it would be able to convince a truly independent owner to give-up 96.4 percent of its current 60 dBu population simply to permit the Rosenberg station to re-locate and increase its

population.

The operation at Moss Bluff will result in a 48 percent reduction in total population with 53.1 percent of the population being currently served loosing that service. The proposed loss population includes 1,939 persons that receive just 3 or 4 services.

Adoption of the Tichenor proposals will result in 330,649 current listeners being denied service from the three stations they have supported and come to rely on. One of the existing stations is so reduced in population (-96.4%) that it might as well be deleted from the FM table of allotments. El Dorado does not believe that this disruption in existing listening patterns is justified simply because one of those stations wishes to move closer to the Houston Urbanized Area, claim a new city of license which is part of the Houston Urbanized Area and provide service to a population some of whom currently receive service from 26 existing aural services.

Adoption of a new FM proposal at Reeves, LA, creates a new outlet for people to express their views and this better serves the public interest than an upgrade of existing facilities. Adoption of the Tichenor proposal results in no additional FM stations.

D. Potential Objections by FAA to Tichenor Proposal:

An evaluation of the Tichenor proposal was conducted by John P. Allen ("Allen") to determine the likelihood of Tichenor being able to secure FAA approval. The Allen analysis concludes that Tichenor's Missouri City proposal

causes substantial electromagnetic interference (EMI) as evaluated by the FAA's computer program which is used to predict such potential interference. The existing facility at Rosenberg is predicted to cause 649 points of interference to one localizer frequency.

The FAA has a policy to permit the modification of existing facilities provided the modified facility is predicted to cause no greater number of points of interference and provided no additional FAA frequencies are impacted.

The analysis by Allen included the proposed allotment reference point at Missouri City and three additional reference points to the north, east & south. A site to the west was not evaluated since it would be short spaced. The analysis determined that each of the four sites caused between 3,100 to 4,680 points of interference involving four or five separate FAA frequencies. Based upon this substantial increase in predicted interference points and frequencies Mr. Allen concluded the FAA would object to the proposal for Ch. 285C3 at Missouri City.

A similar EMI analysis was conducted for the proposal to allot Ch. 285A to Reeves, LA. The analysis by Allen concluded that no interference would be predicted and therefore, the FAA would be expected to approve such a proposal.

Objections from the FAA based upon potential EMI has been a decisional factor in the outcome of FM channel rule makings decided by the FCC. Most recently, in MM Docket 97-196, the FCC deleted a previously allotted channel for which there was one pending application based upon that

applicant's inability to secure FAA approval. The FAA's objection to the pending application was completely based upon the prediction of EMI by the same computer program used in the Allen analysis. There the FCC stated that had they know of the EMI problem they would not have allotted the channel in the original rule making proceeding.

E. Existing Local Aural Services - Rosenberg, TX:

Besides the existing operation of KOVA FM (which began operation in December 1987), the city of Rosenberg (population 20,183) has one licensed daytime only AM facility, KRTX AM, 980 kHz, 1 kW ND-D. This AM facility is owned by Tichenor. KRTX holds a construction permit to operate with 5 kW day and 4 kW night using directional antennas from two separate sites. However, with the adoption of the 3 year term limits, that CP expired on 4/15/1999. The CP was originally granted on 9/7/1993 (file number 900130AE).

A review of the KRTX license file indicates that it filed a 302 application on 4/15/1999 indicating construction had been completed but the necessary field measurements were not yet completed and those necessary measurements were in the process of being made. No waiver or extension request was filed.

Without the necessary field measurements it is impossible for KRTX to obtain limited program test authority (PTA) and thus, commercial operation of the nighttime array at night is not permitted under the FCC rules. As of the middle of June (some 8 weeks later) no measurements have been filed by KRTX.

The KRTX CP also authorized the construction of a daytime directional facility at their current site. KRTX has not addressed this portion of the CP and why it failed to file its license application.

Based upon the above, it is believed that KRTX pending (defective) 302 application will be dismissed and that the underlining CP has already been automatically cancelled. KRTX must start the 301 application process completely over if it still wishes to improve its AM facility. It must also update where required its application for CP to insure that it now complies with the revised AM protection standards that were adopted in 1991. At the present time, KRTX is a daytime only AM facility. As a result of the cancellation of the AM CP, if Tichenor's request to move KOVA FM to Missouri City is granted then the 20,183 persons residing in Rosenberg with no longer have any licensed nighttime facility to rely on.

III. SUMMARY:

El Dorado believes that an entire new NPRM should be issued in this case because the captioned city failed to receive an indication of continuing interest. In the alternative, El Dorado Communications, Inc., supports the proposed allotment of Ch. 285A to Reeves, Louisiana. In addition, El Dorado opposes the counterproposal by Tichenor to modify three separate existing FM facilities. The proposed modifications substantially reduce the existing populations served by two of those stations. If Tichenor did not already own the most severely impacted of these facilities (Galveston) it is unlikely that it could convince a truly independent owner to give-up 96.4% of its existing 60 dBu population. Just because Tichenor owns the facility which benefits the most and the facility which is most severely impacted is no reason for one to conclude that

what is good for Tichenor is good for the public.

Furthermore, it is believed that Tichenor's Missouri City proposal will be unable to secure approval from the FAA. Without such approval from the FAA, Tichenor will be unable to produce the population increase that it bases its public interest argument on. Thus, a real potential exists for a substantial net reduction in service population since two of the changes may not be able to be reversed since new channels and new cities are involved.

Finally, the re-allocation to Missouri City will deprive Rosenberg of its only full-time aural service.


John J. Mullaney

June 23, 1999.

CERTIFICATE OF SERVICE

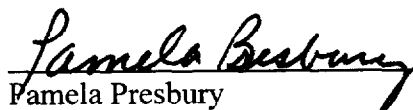
I, Pamela Presbury, a secretary in the law firm of Davis Wright Tremaine LLP, do hereby certify that a copy of the foregoing "REPLY COMMENTS AND OPPOSITION TO COUNTERPROPOSAL" has been sent by first-class mail, postage prepaid, this 24th day of June, 1999, to each of the following:

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